

The Honorable David G. Estudillo

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

WILL CO. LTD. a limited liability company
organized under the laws of Japan,

Plaintiff,

vs.

KAM KEUNG FUNG, aka 馮錦強, aka
FUNG KAM KEUNG, aka FUNG KAM-
KEUNG, aka KUENG FUNG, aka KEUNG
KAM FUNG, aka KAM-KEUNG FUNG, aka
KEVIN FUNG, an individual; FELLOW
SHINE GROUP LIMITED, a foreign company,
and DOES 1-20, d/b/a AVGLE.COM,

Defendants.

Case No.: 3:20-cv-05666-DGE

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION TO COMPEL
DISCOVERY AGAINST DEFENDANT
FUNG**

THIS MATTER having come before the Court on Plaintiffs' Motion to Compel
Discovery and this Court having considered all filings related,

IT IS HEREBY ORDERED Plaintiffs' Motion to Compel Discovery is GRANTED, and
Defendant Fung shall produce all requested documents, without limiting by those with United
States entities or only expressing referencing or concerning the United States.

FURTHER, IT IS HEREBY ORDERED that Fung shall pay Will Co. attorneys' fees
incurred in filing the motion to compel in an amount to be determined after application by Will
Co., which is to be filed within 20 days of entry of this Order.

[PROPOSED] ORDER GRANTING MOTION TO
COMPEL DISCOVERY - 1
[NO. 3:20-cv-05666 DGE]

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

DATED: _____, 2021.

HONORABLE DAVID G. ESTUDIO
UNITED STATES DISTRICT JUDGE

Presented By:

s/ Spencer Freeman
Spencer D. Freeman, WSBA No. 25069
Freeman Law Firm, Inc.
1107 ½ Tacoma Avenue South
Tacoma, WA 98402

[PROPOSED] ORDER GRANTING MOTION TO
COMPEL DISCOVERY - 2
[NO. 3:20-cv-05666 DGE]

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)